

**IN THE UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF DELAWARE**

DAVIS INTERNATIONAL, LLC, HOLDEX, LLC,:
FOSTON MANAGEMENT, LTD, and :
OMNI TRUSTHOUSE, LTD, :

Plaintiffs, :

v. :

NEW START GROUP CORP., VENITOM CORP.,:
PAN-AMERICAN CORP., MDM BANK, :
URAL-GORNO METALLURGICAL COMPANY, :
EVRAZ HOLDING, :
MIKHAIL CHERNOI, OLEG DERIPASKA, :
ARNOLD KISLIN, MIKHAIL NEKRICH, and :
ISKANDER MAKMUDOV, :

Defendants. :

Civil Action

No. 04-1482-GMS

STUPULATION AND PROPOSED SCHEDULING ORDER

It is stipulated by and between the parties hereto, through their undersigned counsel, and subject to the approval of the Court, that:

1. On July 12, 2007, the Court issued an Order (D.I. 114) setting forth the briefing schedule with respect to the issue of anti-suit injunction (the "Scheduling Order").
2. The Scheduling Order provided that the defendants file the opening brief within thirty (30) days of the date of the Scheduling Order, the plaintiffs file the answering brief thirty (30) days after the due date of the defendants' opening brief, and the defendants file a reply brief fifteen (15) days after the due date of the plaintiffs' answering brief.
3. The defendants filed their Opening Brief In Support of Defendants' Motion for a Permanent Injunction on August 13, 2007.

4. According to the Scheduling Order, the date for filing of the plaintiffs' answering brief falls on September 13, 2007, which is Rosh Hashanah, a Jewish religious holiday.

5. In order to accommodate the counsels' schedule around this holiday, the parties have agreed that the plaintiffs will have until September 17, 2007 to file an answering brief to the defendants' Opening Brief In Support of Defendants' Motion for a Permanent Injunction.

6. The defendants will have till October 3, 2007 to file a reply brief.

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IT IS SO ORDERED.

Dated: _____

Gregory M. Sleet. U.S.D.J.